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May 2, 2022

VIA ECF

The Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, New York 10007

Re: *Gernette Cowell v. Target Corporation*
Docket No.: 1:21-cv-08289-RA

Dear Judge Abrams:

We represent defendant, Target Corporation (“Target”), in connection with the above-referenced matter. We are writing on behalf of both parties pursuant to Your Honor’s March 23, 2022 Order requiring the parties to submit a joint letter updating the Court on the status of the case, including whether either party intends to file a dispositive motion and what efforts the parties have made to settle the action. Additionally, the parties are writing to request a brief extension of time to complete expert discovery. The current expert discovery deadline is May 2, 2022. This is the first request for an extension of the expert discovery deadline, and the second request for an extension of time in this action.

With regard to the status of discovery, the parties recently completed depositions in this matter. Additionally, Plaintiff appeared for an IME on April 21, 2022. However, Target is waiting on the report from its expert, Dr. Andrew Bazos. Additionally, Plaintiff has not yet served her expert disclosures in this matter. Therefore, the parties respectfully request that the expert discovery deadline be extended sixty (60) days to July 1, 2022.

Additionally, the parties recently began settlement discussions. Therefore, the parties respectfully request that the post-discovery conference currently scheduled for May 6, 2022 at 12:15 PM be adjourned approximately sixty (60) days while the parties complete expert discovery and continue settlement discussions. The parties propose that they submit another joint status letter to the Court by July 1st in order to advise the Court as to the status and/or success of their settlement discussions and also to advise the Court regarding whether either party intends to file a dispositive motion.

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We thank Your Honor for consideration of the above.

Respectfully submitted,

Sierra N. Kresin

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CC (via ECF & E-Mail):

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Application granted. The conference presently scheduled for May 6, 2022 is hereby adjourned to July 1, 2022 at 4:30 p.m.

SO ORDERED.

A handwritten signature in blue ink, appearing to be 'Ronnie Abrams', written over a horizontal line.

Hon. Ronnie Abrams

5/4/22